

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

THE UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
ALMA VAZQUEZ a.k.a "ALMA ARCOS,") Case Number: 18-CR-2668-JCH
Defendant,)

)

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant, Alma Vazquez a.k.a Alma Arco, through her counsel Kurt Kerns and Jason Alarid, and hereby respectfully requests that the Court modify the conditions of release. In support of this motion, the defendant submits the following:

1. Alma has been supervised on pretrial release in the District of Kansas since September 2018 on GPS monitoring.
2. The assigned officer in Kansas reports Ms. Vazquez is fully compliant with her conditions of release and is recommending the removal of condition 7(p) and 7(q) which are the conditions ordering location monitoring/GPS
3. Defense counsel has spoken with Paul Mysliwiec, and there is no objection to this request.

WHEREFORE, and for the reasons stated above, Defendant respectfully requests that the Court enter and Order modifying the conditions of release.

Respectfully Submitted,

/s/Kurt P. Kerns

Kurt P. Kerns #15028
328 North Main Street
Wichita, Kansas 67202
(316) 265-5511
E-mail: kurtpkerns@aol.com
Attorney for Alma Vazquez

electronically signed
Jason Alarid
Attorney for Alma Vazquez
1412 6th Street NW
Albuquerque, NM 87102
(505) 247-9500

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Motion to Continue was filed and served electronically pursuant to the CM/ECF system on April 1, 2019, on all counsel of record.

/s/**Kurt P. Kerns**
Kurt P. Kerns #15028